

LAW OFFICES OF ROBERT P. SPRETNAK  
Robert P. Spretnak, Esq. (Bar No. 5135)  
8275 S. Eastern Avenue, Suite 200  
Las Vegas, Nevada 89123  
Telephone: 702-454-4900  
Fax: 702-938-1055  
Email: bob@spretnak.com

ADAdvocates LLC  
George W. Wickhorst, III, Esq. (pro hac vice to be filed)  
777 Brickell Avenue, Suite 400  
Miami, Florida 33131  
Telephone: 305-481-9809  
Email: george@adadvocates.org

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOHN MEGGS,

Plaintiff,

vs.

L.A. PACIFIC CENTER, INC., a Nevada  
corporation,

Defendant.

Case No.: 2:24-cv-02021-JAD-BNW

**STIPULATED DISCOVERY PLAN  
AND SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH LR 26-1(b)**

Plaintiff JOHN MEGGS and Defendant L.A. PACIFIC CENTER, INC., a Nevada corporation, by and through their respective counsels of record, participated in the meeting required under Fed. R. Civ. P. 26(f), held on **March 14, 2025**. Pursuant to Fed. R. Civ. P. 26(f) and LR 26-1(b), the parties stipulate to the following discovery plan and scheduling order:

1. The initial disclosures to be made pursuant to Fed. R. Civ. P. 26(a)(1) shall be made by **March 28, 2025**, two weeks after the date that the parties held their initial meeting pursuant to Fed. R. Civ. P. 26(f).

2. Unless otherwise limited by subsequent stipulations, the parties shall be allowed to conduct discovery to the full extent permitted under the Federal Rules of Civil Procedure.

3. The attorneys of record in this matter are registered for electronic filing with this

1 Court. Any documents electronically filed with this Court are deemed to be sufficiently served on  
2 the other party as of the date that the document is electronically filed with this Court.

3 Pursuant to LR 26-1(b), the parties do hereby additionally stipulate to the following discovery  
4 plan and scheduling order:

5 1. Discovery Cut-Off Date: **June 23, 2025**, which is 180 days from December 23, 2024,  
6 the date of the filing of Defendant L.A. Pacific Center, Inc.'s Answer to Plaintiff's Complaint (ECF  
7 No. 10). Any stipulations or motions to extend the discovery period shall be filed no later than **June**  
8 **2, 2025**, 21 days prior to the scheduled discovery cut-off, as required by LR 26-4. Any stipulations  
9 or motions to extend any other deadlines set forth below shall be filed no later than 21 days prior to  
10 the applicable deadline set forth below.

11 2. Amending the Pleadings and Adding Parties: All motions to amend the pleadings or  
12 to add parties shall be filed not later than **March 25, 2025**, 90 days prior to the scheduled close of  
13 discovery.

14 3. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts): Disclosures concerning experts shall  
15 be made by **April 24, 2025**, 60 days before the close of discovery. Disclosures respecting rebuttal  
16 experts shall be made by **May 26, 2025**, 30 days after the initial disclosure of experts.

17 4. Dispositive Motions: The date for filing dispositive motions shall be not later than  
18 **July 23, 2025**, 30 days after the discovery cut-off date. In the event that the discovery period is  
19 extended from the discovery cut-off date set forth in this Stipulated Discovery Plan and Scheduling  
20 Order, the date for filing dispositive motions shall be extended for the same duration, to be not later  
21 than 30 days from the subsequent discovery cut-off date.

22 5. Pretrial Order: The date for filing the joint pretrial order shall be not later than  
23 **August 22, 2025**, 30 days after the date set for filing dispositive motions. In the event that  
24 dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30  
25 days after decision on the dispositive motions or until further order of the court.

26 6. Fed. R. Civ. P. 26(a)(3) Disclosures: The disclosures required by Fed. R. Civ. P.  
27 26(a)(3), and any objections thereto, shall be included in the pretrial order.

28 7. Alternative Dispute Resolution: The parties certify that they met and conferred about

the possibility of using alternative dispute-resolution processes including mediation, arbitration, and early neutral evaluation. The parties agree that this matter is appropriate for an early neutral evaluation conference, which has not yet been scheduled by the court.

8. Alternative Forms of Case Disposition: The parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73, and to the use of the Short Trial Program (General Order 2013-01). The parties did not agree to consent to trial by magistrate judge or to the use of the Short Trial Program.

9. Electronic Evidence: The parties certify that they discussed whether they intend to present evidence in electronic format to jurors for the purposes of jury deliberations. The parties have agreed to produce electronically-stored evidence in either paper or .pdf format, absent a showing of good cause for such evidence to be produced in native format.

DATED: March 14, 2025.

LAW OFFICES OF ROBERT P. SPRETNAK

By: /s/ Robert P. Spretnak  
Robert P. Spretnak, Esq. (Bar No. 5135)

8275 S. Eastern Avenue, Suite 200  
Las Vegas, Nevada 89123

ADAdvocates LLC

By: George W. Wickhorst, III, Esq.  
(admitted pro hac vice)

777 Brickell Avenue, Suite 400  
Miami, Florida 33131

Attorneys for Plaintiff

DATED: March 14, 2025.

O'HAGAN MEYER PLLC

By: /s/ Jeffrey D. Winchester  
Marcus J. Lee, Esq. (Bar No. 15769)  
Jeffrey D. Winchester, Esq. (Bar No. 10279)

300 S. Fourth Street, Suite 1250  
Las Vegas, Nevada 89101

Attorneys for Defendant

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATED: 3/17/2025